

October 13, 2003

LAWRENCE DUNN
1318 37TH ST #3348
EVERETT WA 98201

Subject: PDC Case No. 04-021

Dear Mr. Dunn:

The Public Disclosure Commission staff has completed its investigation of your complaint filed on July 31, 2003, alleging that Senator Aaron Reardon used surplus campaign funds to purchase an airline ticket and hotel accommodations for his spouse.

The PDC staff reviewed your allegations in light of the following statute:

RCW 42.17.095 authorizes an elected official to establish an account into which surplus funds may be deposited and from which nonreimbursed, office-related expenses may be paid.

WAC 390-24-032 defines a nonreimbursed office-related expense as *“an expenditure incurred by an elected or appointed official, or a member of his or her immediate family, solely because of being an official.”*

You alleged that Senator Reardon used his surplus funds to purchase *“Kate Reardon’s Delta airline ticket”* and that *“one would conclude Kate Reardon did not pay for additional lodging expenses while accompanying her husband to the Democratic Leadership Council Annual Meeting.”*

We found that:

- Senator Reardon registered a surplus funds account on January 13, 1999 and has reported expenditures through August 31, 2003.
- Kate Reardon is Senator Reardon’s spouse.
- Kate Reardon did not travel with Senator Reardon to attend the Democratic Leadership Council Annual Meeting.

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- Senator Reardon was a Washington delegate for the House Democratic Caucus to a 2001 meeting of the National Conference of State Legislators (NCSL) held in San Antonio, Texas. Senator Reardon's airfare was paid by the State of Washington. Senator Reardon used his surplus funds to purchase an airline ticket for his spouse so that she could accompany him to San Antonio, Texas.

There is no evidence that Senator Reardon improperly used his surplus campaign funds. Senator Reardon attended the NCSL meeting because he was an elected state representative. Using surplus campaign funds to pay a spouse's expenses while the spouse accompanies an elected state representative performing official duties is an appropriate use of surplus campaign funds.

After a careful review of the alleged violations and relevant facts, we have concluded our investigation and, with the concurrence of the Chair of the Public Disclosure Commission, I am dismissing your complaint against Senator Aaron Reardon.

Sincerely,

Vicki Rippie
Executive Director

c: Senator Aaron Reardon